

## UNITED STATES DISTRICT COURT JAN 10 2020

for the  
Southern District of Texas

David J. Bradley, Clerk

United States of America  
v.  
Luz RAMIREZ  
YOB: 1985 COB: United States

Case No. M-20-0645

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 01/09/2020 in the county of Starr in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description


18 USC 922(g)(1) Possession of a firearm or ammunition, which has affected  
interstate commerce, by an individual having been convicted of a  
felony

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.

Approved by: PCP 1-10-2020

  
Complainant's signature  
Joshua Wedesky - ATF Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Date:

1/10/2020

City and state: McAllen, Texas

  
Judge's signature  
U.S. Magistrate J. Scott Hacker  
Printed name and title

ATTACHMENT A

I, Special Agent Joshua Wedesky, affiant, do hereby depose and state the following:

I am a Special Agent of the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been a law enforcement officer since March 2015.

My duties include the investigation of violations of Federal firearms laws. I know it to be unlawful for any person who has been convicted of a crime punishable by more than one year in prison to possess a firearm or ammunition that has affected interstate or foreign commerce.

1. On Thursday, January 9, 2020, law enforcement officers received information that an illegal alien was instructed to pick up approximately 6,000 rounds of rifle ammunition from a business located in Roma, Texas. Law enforcement officers conducted a consent search at the business and located approximately 6,000 rounds of ammunition. Also at the business, law enforcement officers encountered Luz RAMIREZ who was found to have access to the 6,000 rounds of ammunition. Law enforcement officers determined that RAMIREZ was a convicted felon currently on Federal probation. The illegal alien stated he received ammunition from RAMIREZ at the business on two (2) previous occasions, and on those occasions RAMIREZ had assisted the illegal alien in loading the ammunition into the illegal aliens' vehicle.

2. Law enforcement officers proceeded to conduct a custodial interview with RAMIREZ. After being advised of his Miranda Rights, RAMIREZ admitted to being a previously convicted felon. RAMIREZ also admitted to ATF agents that he worked at the business and would receive inventory that included firearms and ammunition.

ATTACHMENT A

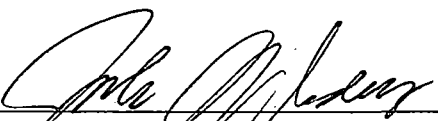
3. Your affiant reviewed the criminal history of RAMIREZ which revealed he has two (2) previous felony convictions:

- September 20, 2011: convicted of Conspiracy to Possess with Intent to Distribute 537.93 Kilograms of Marihuana in the United States District Court - Southern District of Texas (Case No. 2:11CR00432-003).

- September 25, 2017: convicted of Transporting an alien within the U.S. for private financial gain in the United States District Court - Southern District of Texas (Case No. 7:17CR00853-001).


Judgment of conviction documentation has been obtained confirming the felony conviction for RAMIREZ. This felony conviction shows that RAMIREZ was convicted of a crime punishable for up to a year or more in prison.

4. ATF Interstate Nexus Expert Carlos Delgado was contacted for verbal Interstate Nexus determination on the ammunition that was located inside the business and possessed by RAMIREZ. The ATF Interstate Nexus Expert determined that the ammunition was found to be manufactured outside of the state of Texas and affects interstate or foreign commerce.

  
Joshua Wedesky - ATF Special Agent

Sworn to before me and subscribed in my presence,

  
U.S. Magistrate J. Scott Hacker

  
January 10, 2020